

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

| | | |
|--------------------------------------|---|--|
| NIKKI KELLEY, |) | Case No. 5:20-cv-00412-SL |
| |) | |
| Plaintiff, |) | Judge Sara Lioi |
| |) | |
| vs. |) | <u>PLAINTIFF'S PRELIMINARY ESTIMATE</u> |
| |) | <u>OF ATTORNEYS' FEES AND EXPENSES</u> |
| PUB GROUP 3 MANAGEMENT, LLC, ET AL., |) | |
| |) | |
| Defendants. |) | |

The following is a preliminary estimate of Plaintiff, Nikki Kelley's anticipated attorneys' fees and expenses:

| | <u>Attorneys' Fees</u> | <u>Expenses</u> |
|--|------------------------|--------------------|
| Preliminary Investigation and Filing Complaint | \$ 1,757.50 | \$ 400.00 |
| Procedural Motion Practice | \$ 5,000.00 | \$ 1,000.00 |
| Discovery | \$15,000.00 | \$ 1,000.00 |
| Depositions | \$15,000.00 | \$10,000.00 |
| Dispositive Motion Practice | \$20,000.00 | \$ 200.00 |
| Settlement Negotiations | \$ 3,000.00 | N/A |
| Experts | \$ 2,000.00 | \$ 5,000.00 |
| Witness Fees | N/A | \$ 500.00 |
| Trial | \$75,000.00 | \$ 5,000.00 |
| TOTAL | \$136,757.50 | \$23,100.00 |

Respectfully submitted,

/s/ Matthew S. Grimsley

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 30th day of June 2020, the forgoing was sent by email to: Ralph Dublikar, Esq. (*dublikar@bakerfirm.com*) and Andrea Ziarko, Esq. (*andreaz@bakerfirm.com*), Baker, Dublikar, Beck, Wiley & Matthews, 400 South Main Street, North Canton, Ohio 44720, counsel for Defendants.

/s/Matthew S. Grimsley

One of Plaintiff's Attorneys